

EXAMINATION INTO THE SOUNDNESS OF THE NORTH SOMERSET CORE STRATEGY: CONSEQUENTIAL CHANGES TO POLICIES CS6, CS14, CS19, CS28, CS30, CS31, CS32 AND CS33

STATEMENT ON MATTER 3: POLICIES

Inspector's Question 3.

In those settlements and locations where the consequential changes have significantly increased the housing requirement, can it be demonstrated that the capacity exists to deliver the increased number of homes to enable the Core Strategy housing requirement, including those of the consequential changes, to be met in the following locations, in terms of overall numbers and housing mix?

- a. Policy CS28: Weston-super-Mare**
- b. Policy CS30: Weston Villages**
- c. Policy CS31: Clevedon, Nailsea and Portishead**
- d. Policy CS32: Service Villages**
- e. Policy CS33: Infill villages, smaller settlements and countryside**

3.1 The Council argue at Paragraph 8 of their response to Inspector's letter of 24th February that the December 2014 HELAA (MD/11) provides evidence of potential capacity of 28,355 dwellings '*which could be delivered in accordance with the existing spatial strategy (and without using Green Belt).*' The Council also rely on the emerging Site Allocations Plan (SAP) as evidence of how this will be interpreted in Practice.

3.2 It is important to note that the Inspector's Report into Policy CS13 does not necessarily accept the Council's potential capacity figure of 28,355 and makes it clear that some elements of the potential supply will '*need to be*

addressed in the Examination of any consequential changes to the remitted policies dealing with housing delivery.'

3.3 In relation to the SAP the Council has advised that:

- Taking into account completions and existing commitments, the Site Allocations Plan only needs to identify sites for 1,715 dwellings in order to ensure that the housing requirement of 20,985 dwellings is achieved.
- The Site Allocations Plan has been prepared in accordance with the LPA's proposed changes to the remitted policies.

3.4 It is surprising that NSC has sought to advance the consultation process for the SAP at this time. It is also premature for the Council to prepare a Site Allocations Plan that is based on the above assumptions. There have been significant objections to the LPA's proposed changes to the remitted policies of the Core Strategy and they have not yet been subject to examination. The key objections include:

- The proposed increases to the dwelling requirements for the various settlements have not been justified.
- It is not considered that NSC's evidence on future housing delivery is properly justified. For example, the consultation document for the remitted policies advises that 589 dwellings will be delivered on 'Other Identified Sites', However, no information has been provided on the location or deliverability of these sites (simply that they are brownfield).
- The consultation document for the remitted policies does not assess whether the Council's employment-led approach to development (1.5 jobs per dwelling) in Weston-super-Mare and the Weston Villages remains achievable when taking into account the increased housing numbers.

- It is not considered that NSC has properly explored or tested whether or not it will be necessary to release land from the Green Belt to help meet the increase housing requirement.
- It is not considered that NSC has properly considered the ability for Nailsea to accommodate future housing and employment growth to help meet the increase housing requirement.
- NSC has not considered any alternative distribution scenarios.
- There has not been a Sustainability Appraisal of the proposed changes to the remitted policies.

3.5 At this stage the SAP should be given very little weight if any at all.

Inspector's Question 5.

Does the increased housing requirement justify any modification to:

a. Policy CS6: Green Belt

b. Policy CS19: Strategic Gaps

3.6 It is considered that the Council has failed to objectively assess the potential need for modifications to the Green Belt and has not properly reviewed the potential contribution which land within it could make. Indeed the December 2014 HELAA simply dismisses non previously developed Green Belt land at the Part 1 stage without properly justifying why.

3.7 The ability for Green Belt boundaries to be reviewed is set out at Paragraphs 83 and 84 of the NPPF. Clearly the need for such a review must be considered as part of the examination into the remitted policies.

3.8 To understand the relevant evidence in relation to the Green Belt in North Somerset a review of available evidence has been undertaken by The Environmental Dimensions Partnership (EDP) on behalf of LVA. The EDP report was initially prepared in relation to the emerging West of England Joint

Spatial Plan consultation (November 2015) and the Green Belt Review that supported it. However, the issues identified by EDP in their report are also relevant to the remitted policies. Notably the Joint Spatial Plan Green Belt Review document and NSC's earlier Green Belt review only provides a high level strategic assessment of the Green Belt. Paragraph 2.13 of the EDP report confirms that:

'The Assessment provides only a very high level description of the cell and the extent to which it serves each of the purposes and there is no specific reference to it in the Conclusion section. The only reference to the function of each cell is they "directly serves two or more of the five purposes defined in the NPPF".'

'Whilst these 'tests' are entirely representative of the purposes of the Green Belt as set out in the NPPF, this very simplified methodology and weighting system makes the Assessment less flexible and subtle when applied to smaller land parcels. It does not, for example, allow for a more detailed analysis of the extent to which the cells contribute to each of the purposes and what makes one cell any better or worse at serving each of the purposes. This is relevant particularly for making recommendations for re-drawing the boundaries – that is, the subsequent stage which is currently unavailable to inform the options consultation.'

'Whilst this simplification is in some way addressed through the consideration of all areas in the subsequent review provided in Appendix 1 of it, as stated above, the nature in which the cells were seemingly identified from a very large land area appears somewhat cursory.'

- 3.9 In support of LVA's proposal to remove land North of Nailsea from the Green Belt and develop it for housing, detailed cell analysis is provided in EDP's report which applies additional criteria in line with a more detailed, site-specific study against the cells defined in the JSP Assessment. This supports the proposition that the Green Belt around Nailsea should be amended.
- 3.10 The SAP proposes development at Nailsea on a combination of allocations carried over from the Replacement Local Plan as well as new allocations outside the settlement boundary. As set out above it is concerning that the SAP is seeking to set the overall level of growth for Nailsea in advance of the examination into the remitted policies. Concern is also raised regarding the deliverability of the proposed sites. In particular land to the North West of Nailsea is known to be significantly constrained by the overhead pylons which render the development of the site unviable. It is therefore necessary for other available sites to be considered even if this means that land in the Green Belt is assessed.
- 3.11 It is not clear how the Council has identified potential new allocations at Nailsea have been identified although it is assumed that the Housing and Economic Availability Assessment (2014) is NSC's principle source of information. The Council's data relating to potential sites was updated as part of a call for sites in March 2015 although it would appear that this information has not informed the SPA. In particular land North of Nailsea was submitted as part of the March 2015 Call for Sites but was not assessed by the Council in the '*Appendix 1 Residential Site Assessments*' evidence base document.
- 3.12 During earlier stages of the process our client has recommend that Land North of Nailsea is allocated for mixed use development as identified in red on the plan attached at **Appendix 1** of this Hearing Statement.

- 3.13 This site represents the optimal location for an extension to the town. Indeed such an approach was supported through the emerging North Somerset Council Core Strategy process by Nailsea Town Council. However, this local aspiration was not carried through to the adopted Core Strategy as NSC did not consider that releasing land from the Green Belt was necessary in order to achieve the original housing requirement of 14,000 dwellings across the plan period. Since that time the housing requirement for North Somerset Council has increased to 20,985 following re-examination of remitted Policy CS13 and the JSP has also commenced. It is therefore logical that this matter should now be reconsidered.
- 3.14 The Town Council's stance in relation to this matter has been previously confirmed in relation to representations submitted to NSC's further consultation of the remaining remitted Core Strategy policies including Policy CS6 (Green Belt). The Town Council's representations dated 14th December 2015 state:

'Nailsea Town Council reiterates its existing policy as follows:

1. *To support a realignment of the green belt boundary to support employment development at the north east side of the town.*
2. *To extend the area already proposed to be removed from the green belt on the north east of the town to utilise this land for leisure and residential development as well as employment.*
3. *To ensure that infrastructure is not a constraint, to support the construction of an access road from the Bristol Road to the Clevedon Road to the north of the town.*
4. *To support in principle the development of employment and leisure facilities on land beyond the settlement boundary at North West Nailsea, including that in the green belt.*

5. *That any change to the settlement boundary can only be considered if the area between Nailsea and Backwell described below is incorporated into the green belt:*

- *to the north, Bucklands End, the southern side of The Perrings, the Bridleway from the junction of The Perrings and Youngwood Lane and across Morgan's Hill (footpath N4)*
- *the railway line to the south*
- *Station Road to the east (the current western boundary of the green belt)*
- *Netherton Wood Lane/Chelvey Lane to the west'*

3.15 It is understood that the Town Council's support for development in this location remains unchanged and that similar support has been expressed for a mixed use allocation of land North of Nailsea in relation to this latest consultation.

3.16 The NPPF recognises that Green Belt boundaries can be altered '*through the preparation or review of the Local Plan.*' The potential for land currently within the Green Belt to assist in meeting future housing requirements must be properly considered as part of the examination if the remitted policies are to be found sound.

3.17 As discussed above LVA has commissioned a review of the recent West of England Green Belt Assessment (which comprises defined cells within a study area) and has extended this work to consider in more detail the Green Belt surrounding Nailsea. For brevity a copy of this review is not attached to this Hearing Statement although can be provided if required. However, in summary the findings of the report relating to land in the Green Belt, were:

- Land south-east of Nailsea performs only a partial function in fully addressing three of the five Green Belt tests, notably that it does not prevent merging between Nailsea and Backwell;
- Land north of Nailsea, part of which contains the LVA site, provides a limited contribution to the purpose of preventing encroachment from the adjacent settlement edge, this being primarily due to the influence of the adjacent Southfield Road Trading Estate and overhead pylons;
- Land to the east of Nailsea serves a limited function in preventing merging between Nailsea and Backwell;
- Proposed amendments to the Green Belt boundary (and to internal boundaries between the WOE assessment cells) for these areas will ensure the resulting land performs more fully against all purposes of the Green Belt and in so doing, reinforce openness and permanence.

3.18 Whilst the Council's position in relation to the release of Green Belt land immediately to the south of Bristol is well documented we consider that land within the Green Belt to the north of Nailsea should be given further consideration. There is no compelling need to retain this land as Green Belt or keep it permanently open. Development of the site would also be consistent with promoting sustainable patterns of development. Importantly the release of the Green Belt in this location would not set a precedent for further development as there is an obvious natural boundary further north where the land falls away down to the lower lying land and the river. This would create a long term defensible green belt boundary. The potential also exists to reallocate the green belt to the south in order to protect the more sensitive strategic gap between Backwell and Nailsea.

3.19 A mixed use development in this location comprising residential, employment, community uses and sports/leisure facilities would assist in meeting the need for housing locally whilst helping to improve self-containment. Indeed development in this location could provide a catalyst for

future regeneration by addressing Nailsea's dormitory status, the ageing population, the lack of suitable housing mix and assist in creating new local job opportunities.

- 3.20 Importantly the site has good access to the wider road network and also has the potential to deliver a much needed northern bypass road which would reduce congestion locally and provide a more suitable access for the existing and proposed employment areas.
- 3.21 The town of Nailsea was identified as a sustainable settlement suitable to accommodate further residential development when the Core Strategy was originally adopted. Remitted Policy CS31 of the North Somerset Core Strategy acknowledges that greenfield extensions to Nailsea may be acceptable in principle but stipulates that development should not be located in the Green Belt. However, in light of the significant increase in the housing requirement and the constrained nature of other land at Nailsea we consider that this approach should be reconsidered to include possible Green Belt release to the North of Nailsea particularly as this was previously supported by the Town Council.
- 3.22 The Concept Plan at **Appendix 1** illustrates the potential development area. This work will require further refinement in due course although as currently illustrated the site could provide a sustainable mixed use development of around 600 dwellings and 2 hectares of employment land along with strategic green buffers and significant areas of community open space. The site lies adjacent to an area of existing employment providing potential regeneration opportunities. It is also well located to the Town Centre and other facilities including local schools.

Inspector's Question 6.

Is there any significant risk that the consequential changes to the policies would present any identifiable and unresolvable conflict with any of the Core Strategy's extant policies, having regard in particular to:

a. the employment-led strategy of Policy CS20 (which is not before this Examination);

b. any other extant policy not before this Examination;

and if so, what modifications to the consequential changes might be required?

3.9 The LPA has not provided evidence to demonstrate whether or not the Council's employment-led approach to development in Weston-super-Mare and the Weston Villages remains achievable when taking into account the increased housing numbers. The issue being that Policy CS20 (Supporting a Successful Economy) of the Core Strategy requires proposals for developments over 10 dwellings in Weston-super-Mare and the Weston Villages to provide 1.5 jobs per dwelling. The proposed amendments to Policy CS14 result in a combined increase of 4,001 dwellings in those two areas. This in turn would require an increase of around 6,000 jobs. While it is acknowledged that not all residential development in Weston-super-Mare will be on sites above 10 dwellings it is clear that in order to deliver the increased housing requirement there will be a corresponding need to significantly increase employment development. The LPA has provided no evidence to demonstrate that there is sufficient employment land available.

APPENDIX 1 LAND NORTH OF NAILSEA CONCEPT PLAN